

EXHIBIT 2

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

DELTA LOCUM TENENS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:17-fj-00004-R
)	
CIMARRON COUNTY HEALTH AUTHORITY,)	
d/b/a CIMARRON MEMORIAL HOSPITAL,)	
)	
Defendant.)	
)	
And)	
)	
NEWLIGHT HEALTHCARE, LLC,)	
)	
Intervenor.)	

MOTION OF INTERVENOR FOR ORDER DENYING GARNISHMENT

NewLight Healthcare, LLC, (“NewLight”) moves this Court for an order staying or otherwise denying Plaintiff any garnishment of funds from First State Bank that consist of collateral/assets upon which NewLight has a superior interest over the Plaintiff. In support of this motion, NewLight would show the Court the following:

1. Defendant is a debtor to NewLight Healthcare, LLC, pursuant to a certain promissory note by and between the Defendant and NewLight Healthcare, LLC.
2. To secure the Defendant’s obligations under that promissory note, Defendant agreed to a security agreement granting a security interest in and to “all present and future accounts receivable of Debtor and the proceeds therefrom.” The security interest was filed of public record on November 1, 2016 by the filing of a UCC Financing

Statement with the Oklahoma County Clerk, as provided for by Oklahoma law.

Exhibit 1. Said UCC Financing Statements are public record and may be accessed in person at the Clerk's office or on the internet.

3. Accounts receivable that have been collected have been deposited, from time to time, in First State Bank, a banking institution utilized by Defendant. First State Bank is a garnishee in this instant case. Plaintiff seeks to satisfy all or part of a foreign judgment by garnishing the bank account of Defendant with First State Bank.
4. The foreign judgment obtained by the Plaintiff against the Defendant was entered in July, 2017, in the United States District Court for the Northern District of Texas. The foreign judgment was registered in this jurisdiction in this instant action [see Doc.1]. The judgment, and any lien created thereby, upon the assets held by First State Bank, are inferior to the right and interest of NewLight Healthcare, LLC.
5. The Court should enter an order prohibiting garnishment of assets secured by the UCC Financing Statement.

WHEREFORE, premises considered, NewLight Healthcare, LLC, prays that the Court grant the relief requested in this motion.

Respectfully submitted,

/s/Brandon Powell Wilson

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on December 6, 2017, as follows:

Via Notice of Electronic Filing

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/s/Brandon Powell Wilson